

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ARDUINO, LLC,

Plaintiff,

-v-

ARDUINO S.R.L. f/k/a SMART PROJECTS
S.R.L.; GHEO SA; CC LOGISTICS, LLC;
MAGYC NOW LTD; DOG HUNTER INC.; DOG
HUNTER LLC; DOG HUNTER AG; TULYP
HOLDING SA; GIANLUCA MARTINO;
FEDERICO MUSTO; and DOES 1-10,

Defendants.

Civil Action No.: 1:15-cv-10181-DJC

JOINT MOTION TO EXTEND STAY OF DISCOVERY DEADLINES

The Parties respectfully submit this Joint Motion to Extend Stay of Discovery Deadlines, seeking a further stay of all discovery deadlines through August 30, 2016.

Settlement negotiations between the Parties are continuing to progress. As noted in the previous request to extend the stay, *dkt.* 66, the Parties have agreed before the Judge in the co-pending Italian litigation to continue the suspension of all pending actions between the Parties.

The Parties first sought a joint stay of all deadlines on April 26, 2016 based on their “substantial progress in reaching an agreement to resolve this matter.” *Dkt.* 60. Plaintiff sought a further extension of the stay which was not opposed by Defendants, *dkt.* 64, and thereafter Defendants consented to a stay through July 31, 2016, *dkt.* 66. The Parties respectfully seek an extension of the stay through August 30, 2016 in order to allow the Parties to remain focused on

negotiating the worldwide settlement agreement without the distraction of prosecuting this litigation.

The Parties will notify the Court regarding the status of settlement at that time.

Respectfully submitted,

Dated: August 5, 2016

/s/Michael P. Boudett
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CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Lori L Cooper
Lori L. Cooper